

**Law Offices of Avrum J. Rosen, PLLC**  
38 New Street  
Huntington, New York 11743  
(631) 423-8527  
Avrum J. Rosen, Esq.  
Alex E. Tsionis, Esq.

*Proposed Counsel to the Debtor and Debtor in Possession*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X

In re:

Chapter 11

AJM MANAGEMENT, LLC,

Case No.: 23-41664-nhl

Debtor.

-----X

**DEBTOR’S APPLICATION FOR AN ORDER  
ESTABLISHING DEADLINE FOR FILING PROOFS OF  
CLAIM AND DESIGNATING FORM AND MANNER OF NOTICE**

**TO: THE HONORABLE NANCY HERSHEY LORD  
UNITED STATES BANKRUPTCY JUDGE**

AJM Management, LLC, the debtor and debtor in possession (the “Debtor”) in this Chapter 11 case, by and through its proposed counsel, the Law Offices of Avrum J. Rosen, PLLC, respectfully submits this as and for the Debtor’s application (the “Application”) for the entry of an order, under Rule 3003(c)(3) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), fixing a deadline and establishing procedures for filing proofs of claim and approving the form and manner of service thereof, and respectfully sets forth and represents as follows:

**BACKGROUND**

1. On May 12, 2023, the Debtor filed a voluntary petition for relief under Chapter 11 of the United State Code (the “Bankruptcy Code”).

2. The Debtor continues to operate its business and manage its property as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner

or committee has been appointed in this case.

3. The Debtor is a New York limited liability company with its corporate office located at 2623 Foster Ave, Brooklyn, New York 11210.

4. The Debtor is a real estate investment company formed in or around January of 2004 and its business involves the purchase, ownership and management of a residential apartment building. The Debtor's principal asset consists of the real property commonly known as 405 Rockaway Parkway, Brooklyn, New York 11212, in the Borough of Brooklyn, Block: 4672, Lot: 37 (the "Property"). The Property is improved by a four-story walk-up building (including basement) consisting of 31 residential apartments.

### **RELIEF SOUGHT**

5. This Application is submitted in support of the entry of an order establishing a bar date (the "Bar Date") for the filing of proofs of claim or interests ("Proofs of Claim") in the Debtor's case and designating the form and manner of notice thereof.

6. The Debtor has filed Schedules of Assets and Liabilities (the "Schedules").

7. Pursuant to Rule 3003(b)(1) of the Bankruptcy Rules, the Schedules filed by the Debtor constitute *prima facie* evidence of the validity of most of the claims of creditors listed therein. For sake of clarity, the Debtor may have scheduled certain claims as "disputed," "contingent" and/or "unliquidated." Any creditor whose claim is not scheduled or is scheduled as "disputed," "contingent" or "unliquidated" on the Schedules must file a proof of claim, pursuant to Rule 3003(c)(2) of the Bankruptcy Rules. Any creditors who fail to do so shall not be treated as a creditor for purposes of voting and distribution, as provided by Rule 3003(c)(2) of the Bankruptcy Rules.

8. Rule 3003(c)(3) of the Bankruptcy Rules provides that the Court shall fix the time

within which Proofs of Claim may be filed.

9. The Debtor, by and through this Application, hereby requests that pursuant to Rule 3003(c)(3) of the Bankruptcy Rules, this Court fix the time within which the proofs of claim must be filed in this case (the “Bar Date”).

10. As set forth in the annexed proposed order establishing the Bar Date, the Debtor intends to give notice (the “Notice”), substantially in the form annexed hereto as **Exhibit “A”**, by serving a copy of the Notice by first-class mail upon: (i) all known creditors of the Debtor, including, but not limited to, all creditors listed in the Schedules; (ii) all persons or entities that have filed Notices of Appearance under Rule 2002 of the Bankruptcy Rules; (iii) all other known holders of claims, if any, pursuant to the Debtor’s books and records; (iv) counsel to the official committee, should one be appointed; and (v) the Office of the United States Trustee.

11. The Debtor submits that Notice of the Bar Date, as set forth above, is proper and sufficient notice under section 102 of the Bankruptcy Code, and in accordance with Rules 2002 and 9007 of the Bankruptcy Rules.

12. In accordance with the foregoing, the Debtor submits that the entry of the annexed proposed order, is in the best interests of the Debtor, its estate and creditors.

13. The form of proposed order setting the last date to file Proofs of Claim, the procedures thereto, and the Notice, complies with the Procedural Guidelines for Filing Requests for Orders to set the Last Date for Filing Proofs of Claim.

*[Remainder of Page Intentionally Left Blank]*

**NO PREVIOUS REQUEST**

14. No previous application or motion has been submitted to this or any other Court for the relief sought herein.

**WHEREFORE**, the Debtor respectfully requests entry of an order, substantially in the form of the proposed order annexed hereto: (i) establishing a Bar Date and directing notice thereof; together with (ii) such other, further and different relief that this Court may deem just, proper and equitable.

Dated: June 1, 2023  
Huntington, New York

Respectfully submitted,

**Law Offices of Avrum J. Rosen, PLLC**

By: /s/ Avrum J. Rosen  
Avrum J. Rosen, Esq.  
Alex E. Tsionis, Esq.  
38 New Street  
Huntington, NY 11743  
(631) 423-8527  
arosen@ajrlawny.com  
atsionis@ajrlawny.com

*Proposed Counsel for the Debtor  
and Debtor in Possession*